

1 Jeffrey J. Goodrich (SBN 107577)  
2 GOODRICH & ASSOCIATES  
3 336 Bon Air Center, #335  
4 Greenbrae, CA 94904  
(415) 925-8630  
(415) 925-9242

5 Attorneys for Debtors  
6

7 UNITED STATES BANKRUPTCY COURT  
8  
9 NORTHERN DISTRICT OF CALIFORNIA  
10  
11 SAN FRANCISCO DIVISION

12 In re CHAPTER 13  
13 JEFFREY K. RODMAN and DOREEN D. Case No. 19-31010-DM  
14 RODMAN, **DEBTORS' PARTIAL OPPOSITION TO**  
**MOTION OF LEK SERVICE CORP FOR**  
**RELIEF FROM STAY**  
15  
16 Debtors Date: December 3, 2020  
Time: 9:00 a.m.  
Place: Telephonic Appearance  
17  
18  
19  
20  
21  
22  
23  
24

25  
26 Jeffrey and Doreen Rodman, debtors herein ("Debtors") submit the following partial  
27 opposition to the motion of LEK SERVICE CORP ("Lek") for relief from stay ("Motion").  
28

DEBTORS' PARTIAL OPPOSITION TO  
MOTION OF LEK SERVICE CORP FOR  
RELIEF FROM STAY

1        After the filing of Lek's Motion, Debtors closed a refinance of Lek's loan. Attached  
2 hereto as Exhibit "A" is a true and correct copy of the Debtor's refinance Closing Statement showing  
3 the full payoff of Lek's secured claim.

4        Based upon the attached Closing Statement, the Debtors objected to any waiver of the  
5 fourteen-day stay under Bankruptcy Rule 4001(a)(3). The fourteen-day stay will be sufficient to  
6 allow all checks from the refinance to clear and for Lek to confirm receipt of full payment prior to  
7 the stay terminating. If the stay is waived, and Lek either does not receive its check on December 3  
8 or fails to cash it, Debtors are concerned that Lek would be free to notice a Trustee's Sale of the  
9 Debtors' home and add the cost of such publication to a revised loan payoff demand with the  
10 Chapter 13 Trustee.

11 DATED: December 2, 2020

GOODRICH & ASSOCIATES

12        /s/ Jeffrey J. Goodrich  
13        Jeffrey J. Goodrich  
14        Attorneys for Debtor